

City of Houston: 1115 Waiver Update

House Committee on Public Health, Interim Charge #2

Friday, October 15, 2020

The City of Houston Health Department (HHD) (TPI 093774008) is requesting a plan modification to include an allowable variance of 43% for DY9 Category B MLIU due to the COVID-19 pandemic.

In response to COVID-19, HHD implemented a modified Continuity of Operation Program (COOP) plan in March 2020, which significantly impacted HHD's ability to meet the DY9 Category B MLIU targets. These business operation changes were designed to support the COVID-19 citywide response goals related to disease containment, assure a continued level of essential public health and safety services to the residents of City of Houston, and deploy staff to support COVID-19 response efforts.

As a result of the pandemic and in response to the Centers for Disease Control (CDC) recommendations, HHD suspended regular operations including the department's specialty clinics that warrant specific infection control considerations. These specialty clinics account for the largest population of patients served in the HHD system. Additionally, over one third of the staff (400 individuals) were deployed to COVID-19 response efforts including physicians, nurse practitioners, nurses, clinic assistants, dentists, dental hygienists, dental assistants, microbiologists, laboratory technicians, immunization customer representatives, public health investigators, counselors, health planners, community liaisons, and public health educators.

The Commonwealth Fund study, referenced as a source for the DY9 allowable variation, notes that primary care providers saw less of a reduction and a faster recovery due to the ability to conduct many primary care visits via a telehealth platform. While HHD has worked diligently to implement telehealth operations, HHD is a Local Public Health Department and not a primary care provider. HHD's system is primarily made up of specialty clinics that focus on family planning, STD, TB, immunization and dental treatment. These types of outpatient visits often require in-person services that cannot be conducted via a telehealth platform.

HHD's Category B MLIU total was on track to achieve the goal of 39,390 MLIU patients served, with 49.39% of the goal achieved by March 30, 2020. The overall loss of MLIU patient volume is estimated at 14,068 unique individuals as of the end of August with 97% of the decline occurring in the specialty clinics. Programs that saw declines from April to August include the following:

- A loss of 4,252 in the STD clinics due to a suspension of all non-emergency services, the inability to conduct STD testing through telemedicine, and the diversion of staff to COVID-19 response efforts.
- A loss of 4,136 in the immunization clinics which hindered back to school immunization efforts due to a suspension of all non-emergency services, the inability to conduct services through telemedicine, and the diversion of staff to COVID-19 response efforts.

- A loss of 2,243 in the dental clinics and school associated dental program Project Saving Smiles due to a suspension of all non-emergency services, school closures, the inability to conduct services through telemedicine, and the diversion of staff to COVID-19 response efforts.
- A loss of 2,114 in the family planning clinics due to a suspension of all non-emergency services, the inability to conduct services through telemedicine, and the diversion of staff to COVID-19 response efforts.
- A loss of 1,323 across remaining programs including TB clinics, TB Control, the Diabetes and Wellness Network (DAWN) and Nurse Family Partnership due to a suspension of all non-emergency services, the inability to conduct services through telemedicine, and the diversion of staff to COVID-19 response efforts.

It is unlikely that HHD services will resume their pre-COVID-19 volume until the virus is successfully suppressed in the Houston area. HHD continues to operate on a modified specialty clinic schedule and has 300 staff members deployed to COVID-19 response activities. Therefore, HHD is proposing a new allowable variance of 43%. This results in the Category B proposed targets for DY9 to be as follows: Total PPP 23,381, MLIU PPP 22,452, Estimated Medicaid PPP 4,326 and Estimated LIU PPP 18,126. This variance is based on a median of 605 unique individuals served per month during the department's COVID-19 response.